

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

RICHARD ORLINSKI SANCHEZ,
a.k.a. "Sugar,"
RAMON ANTONIO REYES-MEZA,
IGNACIO CHAVEZ, a.k.a. "Nacho,"
JUAN J. FLOREZ, a.k.a. "Moe,"
ANTONIO A. ACOSTA,
GORDON D. MOSS,
JOHN MICHAEL ESQUIBEL, a.k.a.
"Mike,"
RANDY L. REID,
JOHN P. LOPEZ,
NAOMI M. NAJAR,
JUAN J. SILVAS,
STEVEN B. ORNELAS,
RICHARD L. ORTEGA,
RUBEN MORONES,
KRYSTYNA SANCHEZ, and
MELISSA S. MEDINA,

Defendants.

CRIMINAL NO. 20CR2040 RB

Count 1: 21 U.S.C. § 846: Conspiracy;

Counts 2, 3, and 17: 21 U.S.C. §§
841(a)(1) and (b)(1)(A): Distribution of 50
Grams and More of Methamphetamine; 18
U.S.C. § 2: Aiding and Abetting;

Counts 4, 10, 11, 29, 36, and 48: 21
U.S.C. §§ 841(a)(1) and (b)(1)(A):
Distribution of 50 Grams and More of
Methamphetamine;

Counts 5, 8, 12, and 30: 21 U.S.C. §§
841(a)(1) and (b)(1)(A): Possession With
Intent to Distribute 50 Grams and More of
Methamphetamine;

Count 6: 18 U.S.C. § 924(c)(1)(A)(i):
Possessing a Firearm in Furtherance of a
Drug Trafficking Crime;

Counts 7, 31, and 60: 18 U.S.C. §§
922(g)(1) and 924: Felon in Possession of a
Firearm and Ammunition;

Count 9: 21 U.S.C. § 846: Attempted
Possession With Intent to Distribute 50
Grams and More of Methamphetamine;

Counts 13, 15, 16, 18, 21, 22, 24-27, 33-35,
40-43, 45-47, 49, 50, 53-55, 58, and 59: 21
U.S.C. § 843(b): Use of a Communication
Facility to Further the Commission of a
Drug Trafficking Crime;

Count 14: 21 U.S.C. §§ 841(a)(1) and
(b)(1)(B): Possession With Intent to
Distribute 50 Grams and More of a Mixture

) and Substance Containing
) Methamphetamine; 18 U.S.C. § 2: Aiding
) and Abetting;
)
) Count 19: 21 U.S.C. §§ 841(a)(1) and
) (b)(1)(B): Distribution of 50 Grams and
) More of a Mixture and Substance
) Containing Methamphetamine; 18 U.S.C. §
) 2: Aiding and Abetting;
)
) Count 20: 21 U.S.C. §§ 841(a)(1) and
) (b)(1)(B): Possession With Intent to
) Distribute 50 Grams and More of a Mixture
) and Substance Containing
) Methamphetamine;
)
) Count 23: 21 U.S.C. §§ 841(a)(1) and
) (b)(1)(C): Distribution of a Mixture and
) Substance Containing Methamphetamine;
) 18 U.S.C. § 2: Aiding and Abetting;
)
) Counts 28, 44, and 56: 21 U.S.C.
) §§ 841(a)(1) and (b)(1)(A): Possession
) With Intent to Distribute 500 Grams and
) More of a Mixture and Substance
) Containing Methamphetamine; 18 U.S.C. §
) 2: Aiding and Abetting;
)
) Counts 32 and 61: 18 U.S.C. §
) 924(c)(1)(A)(i): Using and Carrying a
) Firearm During and In Relation to a Drug
) Trafficking Crime, and Possessing a
) Firearm in Furtherance of Such Crime;
)
) Count 37: 31 U.S.C. §§ 5324(a)(1),
) 5324(d) and 31 C.F.R. §§ 1010.100,
) 1010.311 and 1010.313: Causing a
) Financial Institution to Fail to File a
) Report;
)
) Count 38: 18 U.S.C. § 1956(h): Money
) Laundering Conspiracy;
)
) Count 39: 18 U.S.C. § 1957: Money
) Laundering; 18 U.S.C. § 2: Aiding and
) Abetting;

-) Count 51: 21 U.S.C. §§ 841(a)(1) and
-) (b)(1)(A): Distribution of 500 Grams and
-) More of a Mixture and Substance
-) Containing Methamphetamine; 18 U.S.C. §
-) 2: Aiding and Abetting;
-)
-) Count 52: 21 U.S.C. §§ 841(a)(1)
-) and (b)(1)(A): Possession With Intent to
-) Distribute 500 Grams and More of a
-) Mixture and Substance Containing
-) Methamphetamine;
-)
-) Count 57: 21 U.S.C. §§ 841(a)(1)
-) and (b)(1)(A): Possession With Intent to
-) Distribute 50 Grams and More of
-) Methamphetamine; 18 U.S.C. § 2: Aiding
-) and Abetting.

INDICTMENT

The Grand Jury charges:

Count 1

From on or about November 19, 2019, and continuing to on or about August 11, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar," RAMON ANTONIO REYES-MEZA, IGNACIO CHAVEZ, a.k.a. "Nacho," JUAN J. FLOREZ, a.k.a. "Moe," ANTONIO A. ACOSTA, GORDON D. MOSS, JOHN MICHAEL ESQUIBEL, a.k.a. "Mike," RANDY L. REID, JOHN P. LOPEZ, NAOMI M. NAJAR, JUAN J. SILVAS, STEVEN B. ORNELAS, RICHARD L. ORTEGA, and RUBEN MORONES**, unlawfully, knowingly, and intentionally combined, conspired, confederated, agreed, and acted interdependently with each other and with other persons whose names are known and unknown to the Grand Jury to commit an offense defined in 21 U.S.C. § 841(a)(1), specifically, distribution of a controlled substance.

Quantity of Methamphetamine Involved in the Conspiracy

With respect to **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar," RAMON ANTONIO REYES-MEZA, IGNACIO CHAVEZ, a.k.a. "Nacho," JUAN J. FLOREZ, a.k.a. "Moe," ANTONIO A. ACOSTA, GORDON D. MOSS, JOHN MICHAEL ESQUIBEL, a.k.a. "Mike," RANDY L. REID, JOHN P. LOPEZ, NAOMI M. NAJAR, JUAN J. SILVAS, STEVEN B. ORNELAS, RICHARD L. ORTEGA, and RUBEN MORONES**, the amount of methamphetamine involved in the conspiracy attributable to each of them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 841(b)(1)(A).

Overt Acts

In furtherance of the conspiracy, and to effect the objects thereof, the following overt acts, among others, were committed in the District of New Mexico, and elsewhere:

Overt Act 1

On November 20, 2019, Ramon Antonio Reyes-Meza agreed to sell a confidential source four ounces of methamphetamine for \$825 and told the confidential source that Ramon Antonio Reyes-Meza was expecting a shipment of 12 to 15 pounds of methamphetamine later that day.

Overt Act 2

On November 20, 2019, Steven B. Ornelas called the confidential source and agreed to meet at the Home Depot in Roswell, New Mexico, in order to conduct the methamphetamine transaction that the confidential source had negotiated with Ramon Antonio Reyes-Meza.

Overt Act 3

On November 20, 2019, at the direction of Ramon Antonio Reyes-Meza, Steven B. Ornelas delivered 111.37 net grams of pure methamphetamine to a confidential source and accepted payment of \$825.

Overt Act 4

On November 20, 2019, after obtaining the \$825 from the confidential source, Steven B. Ornelas delivered the drug proceeds to Ramon Antonio Reyes-Meza.

Overt Act 5

Between December 10, 2019, and December 11, 2019, Ramon Antonio Reyes-Meza agreed to sell a confidential source a pound of methamphetamine for \$3,300 and told the confidential source that his associate would deliver the methamphetamine to the confidential source.

Overt Act 6

On December 11, 2019, at the direction of Ramon Antonio Reyes-Meza, Steven B. Ornelas delivered 417.9 net grams of pure methamphetamine to the confidential source and accepted payment of \$3,300.

Overt Act 7

On December 11, 2019, after obtaining the \$3,300 from the confidential source, Steven B. Ornelas delivered the drug proceeds to Ramon Antonio Reyes-Meza.

Overt Act 8

Between February 3, 2020, and February 6, 2020, Ramon Antonio Reyes-Meza agreed to sell a confidential source a pound of methamphetamine for \$3,300.

Overt Act 9

On February 6, 2020, Ramon Antonio Reyes-Meza sold the confidential source 443.6 net grams of pure methamphetamine in exchange for \$3,300.

Overt Act 10

On February 19, 2020, Ruben Morones asked Richard Orlinski Sanchez to bring Ruben Morones sixteen ounces of methamphetamine before changing his mind and asking Richard Orlinski Sanchez to only bring him eight ounces of methamphetamine.

Overt Act 11

On March 5, 2020, Ramon Antonio Reyes-Meza met with an undercover agent and a confidential source to view a car with a hidden compartment.

Overt Act 12

On March 5, 2020, Ramon Antonio Reyes-Meza asked the undercover agent if the undercover agent could build a secret compartment near the driver's seat of a vehicle so that Ramon Antonio Reyes-Meza could use it to hide his .38 pistol.

Overt Act 13

On April 23, 2020, a female sent a text message saying that the female, Sebastiano Yano Bersane, and Richard Orlinski Sanchez were going to travel to Chaparral, New Mexico, to pick up methamphetamine.

Overt Act 14

On April 24, 2020, the female and Sebastiano Yano Bersane were in route back to Roswell, New Mexico, when they were apprehended at a U.S. Border Patrol Checkpoint near Alamogordo, New Mexico, with 16.607 net kilograms of pure methamphetamine in their vehicle.

Overt Act 15

On April 24, 2020, while Sebastiano Yano Bersane and the female were detained at the checkpoint following the seizure of the methamphetamine, Richard Orlinski Sanchez placed approximately thirty calls to Sebastiano Yano Bersane's cellular phone in an attempt to determine the location of Sebastiano Yano Bersane and the methamphetamine that Sebastiano Yano Bersane had been transporting back to Richard Orlinski Sanchez.

Overt Act 16

On April 28, 2020, Ruben Morones was in possession of 246.28 net grams of pure methamphetamine, \$17,016.02, and a loaded firearm when agents executed a search warrant at his residence.

Overt Act 17

On April 29, 2020, Richard Orlinski Sanchez told a confidential source that he would sell the confidential source four ounces of methamphetamine for \$450 an ounce and that he would leave the methamphetamine for the confidential source at Ignacio Chavez's house.

Overt Act 18

On April 29, 2020, at the direction of Richard Orlinski Sanchez, Ignacio Chavez delivered 67.48 net grams of pure methamphetamine to the confidential source and accepted payment of \$1,400.

Overt Act 19

On April 30, 2020, Richard Orlinski Sanchez asked a confidential source to borrow the confidential source's truck so that Juan J. Silvas could use it to transport methamphetamine from El Paso, Texas, to Roswell, New Mexico.

Overt Act 20

On April 30, 2020, Juan J. Silvas picked up a spare tire filled with methamphetamine from an automobile shop in El Paso, Texas.

Overt Act 21

On April 30, 2020, Juan J. Silvas, driving the confidential source's truck, entered the U.S. Border Patrol Checkpoint between El Paso, Texas, and Carlsbad, New Mexico, with approximately 19 kilograms of methamphetamine hidden in the vehicle.

Overt Act 22

On April 30, 2020, while Juan J. Silvas was detained at the checkpoint following the seizure of the methamphetamine, Richard Orlinski Sanchez placed numerous calls to Juan J. Silvas' cellular phone in an attempt to determine the location of Juan J. Silvas and the methamphetamine that Juan J. Silvas had been transporting back to Richard Orlinski Sanchez.

Overt Act 23

On April 30, 2020, Richard Orlinski Sanchez called the confidential source and told the confidential source that Juan J. Silvas had returned the confidential source's truck to Richard Orlinski Sanchez and that the spare tire was cut up because the methamphetamine had been inside the spare tire.

Overt Act 24

On May 6, 2020, Richard L. Ortega drove into the U.S. Border Patrol Checkpoint in a vehicle containing approximately 4.5 kilograms of methamphetamine, which Richard L. Ortega was in route to deliver to Richard Orlinski Sanchez in Roswell, New Mexico.

Overt Act 25

On May 6, 2020, Richard Orlinski Sanchez met with Richard L. Ortega at an Albertsons in Roswell, New Mexico, in an attempt to take possession of the 4.5 kilograms of

methamphetamine which Richard L. Ortega had attempted to deliver to Richard Orlinski Sanchez.

Overt Act 26

On May 19, 2020, Richard Orlinski Sanchez sold a confidential source 82.4 net grams of pure methamphetamine in exchange for \$1,500 and told the confidential source that he would charge the confidential source \$4,500 for a pound of methamphetamine.

Overt Act 27

On June 1, 2020, Richard Orlinski Sanchez agreed to sell a confidential source a pound of methamphetamine for \$5,000 the following day and instructed the confidential source to pick up the pound of methamphetamine from Ignacio Chavez.

Overt Act 28

On June 2, 2020, Richard Orlinski Sanchez sold the confidential source 407.1 net grams of pure methamphetamine to the confidential source for \$5,500 outside the residence of Ignacio Chavez.

Overt Act 29

On July 22, 2020, Richard Orlinski Sanchez agreed to provide John Michael Esquibel a pound of methamphetamine if John Michael Esquibel could sell the seven ounces of methamphetamine previously provided to John Michael Esquibel by Richard Orlinski Sanchez.

Overt Act 30

On July 22, 2020, Naomi M. Najar collected \$1500 of drug proceeds for Richard Orlinski Sanchez and brokered a deal for 2.5 ounces of methamphetamine.

Overt Act 31

On July 22, 2020, Richard Orlinski Sanchez agreed to save Randy L. Reid one pound of methamphetamine, and Richard Orlinski Sanchez and Randy L. Reid subsequently agreed to meet at Richard Orlinski Sanchez's residence.

Overt Act 32

On July 23, 2020, Richard Orlinski Sanchez told a confidential source that the confidential source could go to Ignacio Chavez's house to purchase methamphetamine.

Overt Act 33

On July 23, 2020, Richard Orlinski Sanchez told Ignacio Chavez to sell one pound of methamphetamine to the confidential source for \$6,000 and to keep \$500 for himself.

Overt Act 34

On July 23, 2020, at Ignacio Chavez's residence, Ignacio Chavez sold 408.1 net grams of pure methamphetamine to a confidential source, and Richard Orlinski Sanchez accepted payment of \$5,550 for the methamphetamine.

Overt Act 35

On July 23, 2020, Richard Orlinski Sanchez told the confidential source that the confidential source could just show up to Ignacio Chavez's residence to purchase methamphetamine in the future without needing to call before arriving.

Overt Act 36

On July 23, 2020, Richard Orlinski Sanchez told Antonio A. Acosta that Gordon D. Moss would deliver methamphetamine to Antonio A. Acosta.

Overt Act 37

On July 23, 2020, at the direction of Richard Orlinski Sanchez, Gordon D. Moss delivered one pound of methamphetamine to Antonio A. Acosta.

Overt Act 38

On July 23, 2020, Antonio A. Acosta complained to Richard Orlinski Sanchez that Gordon D. Moss had only provided him with one pound of methamphetamine when Antonio A. Acosta had been expecting five pounds.

Overt Act 39

On July 23, 2020, Gordon D. Moss told Richard Orlinski Sanchez that he only provided one pound of methamphetamine to Antonio A. Acosta because Antonio A. Acosta only had enough money to pay for the one pound.

Overt Act 40

On July 23, 2020, Randy L. Reid told Richard Orlinski Sanchez that Randy L. Reid would collect drug proceeds in order to provide the proceeds to Richard Orlinski Sanchez and that Randy L. Reid had a customer who wanted to purchase two pounds of methamphetamine.

Overt Act 41

On July 24, 2020, Randy L. Reid asked Richard Orlinski Sanchez for another pound of methamphetamine and subsequently met with Richard Orlinski Sanchez at a truck stop where Randy L. Reid provided Richard Orlinski Sanchez with \$5,500 in drug proceeds.

Overt Act 42

On July 24, 2020, Richard Orlinski Sanchez met with a confidential source and told the confidential source Richard Orlinski Sanchez was working with Ramon Antonio Reyes-Meza and that Richard Orlinski Sanchez could provide the confidential source with methamphetamine for \$5,000 a pound.

Overt Act 43

On July 24, 2020, Richard Orlinski Sanchez agreed to provide Gordon D. Moss with two ounces of methamphetamine, and Gordon D. Moss agreed to provide Richard Orlinski Sanchez with the drug proceeds that Gordon D. Moss had collected the previous day.

Overt Act 44

On July 25, 2020, Richard Orlinski Sanchez and John P. Lopez discussed the possibility of selling methamphetamine in Odessa, Texas, because they could sell it for more money there than in New Mexico.

Overt Act 45

On July 25, 2020, at the direction of Richard Orlinski Sanchez, Gordon D. Moss delivered one pound of methamphetamine to an unknown person in Ruidoso, New Mexico.

Overt Act 46

On July 25, 2020, Richard Orlinski Sanchez informed both Ignacio Chavez and John Michael Esquibel that a load of methamphetamine had been seized at the international border and that Richard Orlinski Sanchez was waiting to see if another load made it through.

Overt Act 47

On July 26, 2020, Richard Orlinski Sanchez asked that Howard Goff deliver an AR rifle to Richard Orlinski Sanchez at the residence of Ignacio Chavez and agreed that he would pay Howard Goff for the AR rifle with methamphetamine.

Overt Act 48

On July 26, 2020, Richard Orlinski Sanchez told Gordon D. Moss that Juan J. Florez was going to be delivering 27 pounds of methamphetamine to Richard Orlinski Sanchez, and Gordon D. Moss asked if Richard Orlinski Sanchez needed Gordon D. Moss to meet Juan J. Florez and pick up the methamphetamine.

Overt Act 49

On July 26, 2020, in anticipation of receiving the 27 pounds of methamphetamine, Richard Orlinski Sanchez asked Naomi M. Najar to rent him a hotel room, and Naomi M. Najar thereafter rented Richard Orlinski Sanchez a room at the Fairfield Inn in Roswell, New Mexico.

Overt Act 50

On July 26, 2020, Antonio A. Acosta requested that Richard Orlinski Sanchez provide Antonio A. Acosta with five pounds of methamphetamine from the load of methamphetamine that Richard Orlinski Sanchez was expecting to be delivered.

Overt Act 51

On July 26, 2020, Juan J. Florez delivered approximately 24 to 27 pounds of methamphetamine to Richard Orlinski Sanchez at the Fairfield Inn in Roswell, New Mexico.

Overt Act 52

On July 27, 2020, Antonio A. Acosta arrived at the Fairfield Inn in Roswell, New Mexico, and Richard Orlinski Sanchez provided Antonio A. Acosta with 2.921 kilograms of pure methamphetamine in the presence of Naomi M. Najar.

Overt Act 53

On July 27, 2020, Antonio A. Acosta was leaving Roswell, New Mexico, with the 2.921 kilograms of pure methamphetamine, along with a loaded firearm and \$2,644 in cash, when he was stopped by law enforcement agents.

Overt Act 54

On July 27, 2020, Richard Orlinski Sanchez and Ignacio Chavez discussed the fact that methamphetamine and/or drug proceeds were buried on the property of Ignacio Chavez's residence, and Richard Orlinski Sanchez told Ignacio Chavez that Richard Orlinski Sanchez would be very mad if anything was missing.

Overt Act 55

On July 29, 2020, Randy L. Reid told Richard Orlinski Sanchez that the drug business was slow and that Randy L. Reid had to cut off some of his customers because they were using COVID-19 as an excuse for not paying their drug debts.

Overt Act 56

On July 29, 2020, John Michael Esquibel assisted Richard Orlinski Sanchez in collecting drug proceeds, and Richard Orlinski Sanchez subsequently paid John Michael Esquibel \$300 for his assistance.

Overt Act 57

On July 29, 2020, Naomi M. Najar told Richard Orlinski Sanchez that she had \$1,500 in drug proceeds to give to Richard Orlinski Sanchez.

Overt Act 58

On July 30, 2020, John P. Lopez sold a confidential source 140.82 net grams of pure methamphetamine in exchange for \$3,000.

Overt Act 59

On July 30, 2020, after selling the 140.82 net grams of methamphetamine to the confidential source, John P. Lopez met with Richard Orlinski Sanchez and provided Richard Orlinski Sanchez with the proceeds from the methamphetamine sale.

Overt Act 60

On July 31, 2020, at the request of Richard Orlinski Sanchez, John P. Lopez agreed to obtain an ounce of an unknown type of drug for Richard Orlinski Sanchez.

Overt Act 61

On July 31, 2020, Richard Orlinski Sanchez told his mother, Krystyna Sanchez, that he needed the smaller bundle of Richard Orlinski Sanchez' drug proceeds, the one that had \$7,000 in it, that Krystyna Sanchez had hidden at her house for Richard Orlinski Sanchez.

Overt Act 62

On July 31, 2020, Richard Orlinski Sanchez used drug proceeds to pay a cash down payment of \$18,285 on a Yukon Denali, and Richard Orlinski Sanchez asked Melissa S. Medina to falsify the paperwork so that she would not have to file the legally required form showing that Richard Orlinski Sanchez had provided over \$10,000 in cash to the car dealership where Melissa S. Medina worked.

Overt Act 63

On August 1, 2020, John P. Lopez met with Richard Orlinski Sanchez and provided Richard Orlinski Sanchez with \$2,900 of drug proceeds.

Overt Act 64

On August 1, 2020, Juan J. Florez told Richard Orlinski Sanchez that Juan J. Florez had collected \$8,000 of drug proceeds and would have an additional \$1,300 in a couple of hours.

Overt Act 65

On August 2, 2020, John Michael Esquibel picked up drug proceeds from Juan J. Florez in Jal, New Mexico, and delivered the money to Richard Orlinski Sanchez.

Overt Act 66

On August 2, 2020, Richard Orlinski Sanchez told Ramon Antonio Reyes-Meza that Richard Orlinski Sanchez had \$22,000 or \$23,000 in drug proceeds ready to give to Ramon Antonio Reyes-Meza.

Overt Act 67

On August 2, 2020, Ramon Antonio Reyes-Meza told Richard Orlinski Sanchez that the drug couriers Ramon Antonio Reyes-Meza had sent were near the spot where they would meet with Juan J. Florez.

Overt Act 68

On August 2, 2020, Richard Orlinski Sanchez told Juan J. Florez that the same drug couriers Juan J. Florez had met with the previous time were going to arrive and instructed Juan J. Florez to meet the couriers at the same place.

Overt Act 69

On August 2, 2020, at the direction of Richard Orlinski Sanchez, Juan J. Florez met with the drug couriers sent by Ramon Antonio Reyes-Meza and picked up approximately 24 pounds of methamphetamine.

Overt Act 70

On August 2, 2020, Juan J. Florez met with Richard Orlinski Sanchez near Jal, New Mexico, and delivered the 24 pounds of methamphetamine that Juan J. Florez had picked up for Richard Orlinski Sanchez.

Overt Act 71

On August 2, 2020, at the request of Richard Orlinski Sanchez, Naomi M. Najar rented a hotel room for Richard Orlinski Sanchez so that Richard Orlinski Sanchez could take the 24 pounds of methamphetamine that he had just picked up to the hotel.

Overt Act 72

On August 3, 2020, John Michael Esquibel provided Richard Orlinski Sanchez with \$2,300 of drug proceeds.

Overt Act 73

On August 4, 2020, Randy L. Reid confirmed that Richard Orlinski Sanchez had received a new load of methamphetamine and that Randy L. Reid owed Richard Orlinski Sanchez \$6,500 for methamphetamine that Richard Orlinski Sanchez had previously provided to Randy L. Reid.

Overt Act 74

On August 4, 2020, John P. Lopez paid Richard Orlinski Sanchez \$4,600 of drug proceeds, and Richard Orlinski Sanchez complained that John P. Lopez still owed Richard Orlinski Sanchez \$4,000.

Overt Act 75

On August 4, 2020, Richard Orlinski Sanchez sold 422 net grams of pure methamphetamine to a confidential informant in exchange for \$5,000.

Overt Act 76

On August 6, 2020, Richard Orlinski Sanchez agreed to provide 1.5 pounds of methamphetamine to Randy L. Reid and then sent Juan J. Florez a text message containing Randy L. Reid's address.

Overt Act 77

On August 6, 2020, at the direction of Richard Orlinski Sanchez, Juan J. Florez delivered 1.5 pounds of methamphetamine to Randy L. Reid.

Overt Act 78

On August 7, 2020, Richard Orlinski Sanchez directed Gordon D. Moss to deliver one pound of methamphetamine to an unknown individual.

Overt Act 79

On August 8, 2020, John Michael Esquibel brokered a deal to sell Richard Orlinski Sanchez a trailer in exchange for a half-ounce of methamphetamine.

Overt Act 80

On August 9, 2020, Richard Orlinski Sanchez told Gordon D. Moss that Richard Orlinski Sanchez needed to retrieve multiple pounds of methamphetamine from Gordon D. Moss because Juan J. Florez wanted three pounds of methamphetamine.

Overt Act 81

On August 9, 2020, John Michael Esquibel told Richard Orlinski Sanchez that John Michael Esquibel had \$5,000 in drug proceeds to take to Richard Orlinski Sanchez.

Overt Act 82

On August 9, 2020, Richard Orlinski Sanchez agreed to meet with Randy L. Reid the following day to provide Randy L. Reid with 1.5 pounds of methamphetamine in exchange for \$7,500.

Overt Act 83

On August 10, 2020, Richard Orlinski Sanchez met with Juan J. Florez in Jal, New Mexico, and picked up more than 11 kilograms of pure methamphetamine.

Overt Act 84

On August 10, 2020, Richard Orlinski Sanchez called Naomi M. Najjar and asked Naomi M. Najjar to rent him a hotel room because he had just picked up a load of methamphetamine, and Naomi M. Najjar thereafter rented Richard Orlinski Sanchez a hotel room.

Overt Act 85

On August 10, 2020, Richard Orlinski Sanchez met with Randy L. Reid and provided Randy L. Reid with approximately 1.5 pounds of methamphetamine.

Overt Act 86

On August 10, 2020, subsequent to meeting with Richard Orlinski Sanchez, Randy L. Reid called Richard Orlinski Sanchez and warned Richard Orlinski Sanchez that the police were

following Richard Orlinski Sanchez and that Richard Orlinski Sanchez should discard the methamphetamine that Richard Orlinski Sanchez had and hide from the police.

Overt Act 87

On August 10, 2020, Richard Orlinski Sanchez ran from the police, and, after hiding a dog food bag filled with 11.818 net kilograms of pure methamphetamine, threw another 86.9 net grams of pure methamphetamine, a gun, and a loaded gun magazine out of his vehicle, while still in possession of another loaded gun and \$9,188 in cash.

In violation of 21 U.S.C. § 846.

Count 2

On or about November 20, 2019, in Chaves County, in the District of New Mexico, the defendants, **RAMON ANTONIO REYES-MEZA** and **STEVEN B. ORNELAS**, unlawfully, knowingly and intentionally distributed a controlled substance, and the offense involved 50 grams and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 3

On or about December 11, 2019, in Chaves County, in the District of New Mexico, the defendants, **RAMON ANTONIO REYES-MEZA** and **STEVEN B. ORNELAS**, unlawfully, knowingly and intentionally distributed a controlled substance, and the offense involved 50 grams and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 4

On or about February 6, 2020, in Chaves County, in the District of New Mexico, the defendant, **RAMON ANTONIO REYES-MEZA**, unlawfully, knowingly and intentionally

distributed a controlled substance, and the offense involved 50 grams and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A).

Count 5

On or about April 28, 2020, in Chaves County, in the District of New Mexico, the defendant, **RUBEN MORONES**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, and the offense involved 50 grams and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A).

Count 6

On or about April 28, 2020, in Chaves County, in the District of New Mexico, the defendant, **RUBEN MORONES**, knowingly possessed a firearm during and in relation to a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, specifically, possession with intent to distribute methamphetamine as charged in Count 5 of this indictment.

In violation of 18 U.S.C. § 924(c)(1)(A)(i).

Count 7

On or about April 28, 2020, in Chaves County, in the District of New Mexico, the defendant, **RUBEN MORONES**, knowing that he had been convicted of at least one crime punishable by imprisonment for a term exceeding one year, specifically:

- (1) possession of a controlled substance, and
- (2) breaking and entering,

knowingly possessed a firearm and ammunition in and affecting commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924.

Count 8

On or about May 6, 2020, in Otero County, in the District of New Mexico, and elsewhere, the defendant, **RICHARD L. ORTEGA**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, and the offense involved 50 grams and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A).

Count 9

On or about May 6, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendant, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** unlawfully, knowingly, and intentionally attempted to commit an offense defined in 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), specifically, possession with intent to distribute 50 grams and more of methamphetamine.

In violation of 21 U.S.C. § 846.

Count 10

On or about May 19, 2020, in Chaves County, in the District of New Mexico, the defendant, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** unlawfully, knowingly and intentionally distributed a controlled substance, and the offense involved 50 grams and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A).

Count 11

On or about June 2, 2020, in Chaves County, in the District of New Mexico, the defendant, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** unlawfully, knowingly and intentionally distributed a controlled substance, and the offense involved 50 grams and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A).

Count 12

On or about June 22, 2020, in Doña Ana County, in the District of New Mexico, the defendant, **RICHARD L. ORTEGA**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 50 grams and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A).

Count 13

On or about July 22, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **JOHN MICHAEL ESQUIBEL, a.k.a. "Mike,"** did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 14

On or about July 22, 2020, in Chaves County, in the District of New Mexico, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **NAOMI M. NAJAR**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 50 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 15

On or about July 22, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **NAOMI**

M. NAJAR, did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 16

On or about July 22, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **RANDY L. REID**, did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 17

On or about July 23, 2020, in Chaves County, in the District of New Mexico, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **IGNACIO CHAVEZ, a.k.a. "Nacho,"** unlawfully, knowingly and intentionally distributed a controlled substance, and the offense involved 50 grams and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 18

On or about July 23, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **ANTONIO A. ACOSTA**, did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 19

On or about July 23, 2020, in Chaves County, in the District of New Mexico, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **GORDON D. MOSS**, unlawfully, knowingly and intentionally distributed a controlled substance, 50 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 20

On or about July 23, 2020, in Chaves County, in the District of New Mexico, the defendant, **ANTONIO A. ACOSTA**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 50 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B).

Count 21

On or about July 23, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **GORDON D. MOSS**, did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 22

On or about July 24, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and

GORDON D. MOSS, did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 23

On or about July 25, 2020, in Chaves County, in the District of New Mexico, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **GORDON D. MOSS**, unlawfully, knowingly and intentionally distributed a controlled substance, and the offense involved a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2.

Count 24

On or about July 25, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **IGNACIO CHAVEZ, a.k.a. "Nacho,"** did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 25

On or about July 26, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **GORDON D. MOSS**, did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime,

specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 26

On or about July 26, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **NAOMI M. NAJAR**, did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 27

On or about July 26, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **ANTONIO A. ACOSTA**, did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 28

On or about July 26, 2020, in Chaves County, in the District of New Mexico, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **JUAN J. FLOREZ, a.k.a. "Moe,"** unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, and the offense involved 500 grams and more of a mixture and substance containing methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 29

On or about July 27, 2020, in Chaves County, in the District of New Mexico, the defendant, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** unlawfully, knowingly and intentionally distributed a controlled substance, and the offense involved 50 grams and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A).

Count 30

On or about July 27, 2020, in Chaves County, in the District of New Mexico, the defendant, **ANTONIO A. ACOSTA,** unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, and the offense involved 50 grams and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A).

Count 31

On or about July 27, 2020, in Chaves County, in the District of New Mexico, the defendant, **ANTONIO A. ACOSTA,** knowing that he had been convicted of at least one crime punishable by imprisonment for a term exceeding one year, specifically:

- (1) possession of marijuana less than or equal to 50 pounds/more than 5 pounds,
- (2) forgery,
- (3) possession of a controlled substance (habitual offender),
- (4) possession of a controlled substance, and
- (5) possession with intent to distribute methamphetamine,

knowingly possessed a firearm and ammunition in and affecting commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924.

Count 32

On or about July 27, 2020, in Chaves County, in the District of New Mexico, the defendant, **ANTONIO A. ACOSTA**, during and in relation to a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, specifically, possession with intent to distribute methamphetamine as charged in Count 30 of this indictment, knowingly used and carried a firearm, and in furtherance of such crime, possessed said firearm.

In violation of 18 U.S.C. § 924(c)(1)(A)(i).

Count 33

On or about July 27, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **IGNACIO CHAVEZ, a.k.a. "Nacho,"** did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 34

On or about July 29, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **NAOMI M. NAJAR**, did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 35

On or about July 30, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendant, **JOHN P. LOPEZ**, did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 36

On or about July 30, 2020, in Chaves County, in the District of New Mexico, the defendant, **JOHN P. LOPEZ**, unlawfully, knowingly and intentionally distributed a controlled substance, and the offense involved 50 grams and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A).

Count 37

On or about July 31, 2020, in Chaves County, in the District of New Mexico, the defendants, **RICHARD ORLINSKI SANCHEZ**, a.k.a. “Sugar,” and **MELISSA S. MEDINA**, for the purpose of evading the currency transaction reporting requirements of 31 U.S.C. § 5313(a) and the regulations promulgated under any such section, caused and attempted to cause a domestic financial institution to fail to file a report required under 31 U.S.C. §§ 5313(a) and any regulation prescribed under any such section, by engaging in cash deposits of domestic coin and currency of approximately \$18,285.

In violation of 31 U.S.C. §§ 5324(a)(1), 5324(d) and 31 C.F.R. §§ 1010.100, 1010.311 and 1010.313.

Count 38

On or about July 31, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **KRYSTYNA SANCHEZ**, unlawfully, knowingly, and intentionally combined, conspired, confederated, agreed, and acted interdependently with each other and with other persons whose names are known and unknown to the Grand Jury to commit an offense defined in 18 U.S.C. § 1957, specifically money laundering.

In violation of 18 U.S.C. § 1956(h).

Count 39

On or about July 31, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **KRYSTYNA SANCHEZ**, knowingly engaged or attempted to engage in a monetary transaction by or through or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is the deposit, transfer and exchange of \$18,285 U.S. currency, such property having been derived from specified unlawful activity, namely, distribution of controlled substances.

In violation of 18 U.S.C. § 1957, and 18 U.S.C. § 2.

Count 40

On or about August 1, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **JOHN P. LOPEZ**, did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 41

On or about August 1, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **JUAN J. FLOREZ, a.k.a. "Moe,"** did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 42

On or about August 2, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **RAMON ANTONIO REYES-MEZA,** did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 43

On or about August 2, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **JUAN J. FLOREZ, a.k.a. "Moe,"** did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 44

On or about August 2, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar," RAMON ANTONIO REYES-MEZA,** and **JUAN J. FLOREZ, a.k.a. "Moe,"** unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 45

On or about August 2, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **NAOMI M. NAJAR,** did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 46

On or about August 3, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **JOHN MICHAEL ESQUIBEL, a.k.a. "Mike,"** did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 47

On or about August 4, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **JOHN P. LOPEZ**, did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 48

On or about August 5, 2020, in Chaves County, in the District of New Mexico, the defendant, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** unlawfully, knowingly and intentionally distributed a controlled substance, and the offense involved 50 grams and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A).

Count 49

On or about August 6, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **RANDY L. REID**, did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 50

On or about August 6, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **JUAN J. FLOREZ, a.k.a. "Moe,"** did unlawfully, knowingly and intentionally use a communication

facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 51

On or about August 6, 2020, in Lea County, in the District of New Mexico, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **JUAN J. FLOREZ, a.k.a. "Moe,"** unlawfully, knowingly and intentionally distributed a controlled substance, 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 52

On or about August 6, 2020, in Lea County, in the District of New Mexico, the defendant, **RANDY L. REID**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A).

Count 53

On or about August 7, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **GORDON D. MOSS**, did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 54

On or about August 8, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **JOHN MICHAEL ESQUIBEL, a.k.a. "Mike,"** did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 55

On or about August 9, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **GORDON D. MOSS,** did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 56

On or about August 9, 2020, in Chaves County, in the District of New Mexico, the defendant, **GORDON D. MOSS,** unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 57

On or about August 10, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendant, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **JUAN J. FLOREZ, a.k.a. "Moe,"** unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, and the offense involved 50 grams and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 58

On or about August 10, 2020, in Chaves County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **NAOMI M. NAJAR,** did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 59

On or about August 9, 2020, in Lea County, in the District of New Mexico, and elsewhere, the defendants, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** and **RANDY L. REID,** did unlawfully, knowingly and intentionally use a communication facility, specifically, a cellular phone, to further the commission of a drug trafficking crime, specifically, conspiracy to distribute 50 grams and more of methamphetamine, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 60

On or about August 10, 2020, in Chaves County, in the District of New Mexico, the defendant, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** knowing that he had been

convicted of at least one crime punishable by imprisonment for a term exceeding one year, specifically:

- (1) distribution of 5 grams and more of methamphetamine, and
- (2) distribution of 50 grams and more of methamphetamine,

knowingly possessed a firearm and ammunition in and affecting commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924.

Count 61

On or about August 10, 2020, in Chaves County, in the District of New Mexico, the defendant, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** during and in relation to a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, specifically, possession with intent to distribute methamphetamine as charged in Count 57 of this indictment, knowingly used and carried a firearm, and in furtherance of such crime, possessed said firearm.

In violation of 18 U.S.C. § 924(c)(1)(A)(i).

SENTENCING ALLEGATION

Before the defendant, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** committed the offenses charged in Counts 1, 9, 10, 11, 14, 17, 19, 23, 28, 44, 48, 51, and 57 of the indictment, the defendant was convicted of Distribution of 5 Grams and More of Methamphetamine, its Salts, Isomers, and Salts of its Isomers, and Aiding and Abetting, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2; and convicted of Distribution of 50 Grams and More of Methamphetamine, its Salts, Isomers, and Salts of its Isomers, and Aiding and Abetting, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2, serious drug felonies, for which he served more than 12 months of imprisonment and

for which he was released from serving any term of imprisonment related to those offenses within 15 years of the commencement of the instant offense.

Before the defendant, **ANTONIO A. ACOSTA**, committed the offenses charged in Counts 1, 20, and 30 of the indictment, the defendant was convicted of Possession With Intent to Distribute a Mixture and Substance Containing a Detectable Amount of Methamphetamine, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2, a serious drug felony, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to those offenses within 15 years of the commencement of the instant offense.

FORFEITURE ALLEGATION – RICHARD ORLINSKI SANCHEZ, a.k.a. “Sugar”

Upon conviction of any offense in violation of 21 U.S.C. §§ 841 or 846, the defendant, **RICHARD ORLINSKI SANCHEZ, a.k.a. “Sugar,”** shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of each offense for which the defendant is convicted, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense(s) of conviction.

The property to be forfeited to the United States includes, but is not limited to, the following:

- a. a Kimber 1911 .45 caliber handgun, serial number K482534,
- b. a Diamond Back 9 mm pistol, serial number YD7218,
- c. approximately seven rounds of 9 mm ammunition,
- d. approximately seven rounds of .45 ammunition, and
- e. approximately \$9,188 United States currency.

Upon conviction of any offense in violation of 18 U.S.C. § 922(g) or 924(c), the defendant, **RICHARD ORLINSKI SANCHEZ, a.k.a. "Sugar,"** shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in the commission of the offense, including, but not limited to:

- a. a Kimber 1911 .45 caliber handgun, serial number K482534,
- b. a Diamond Back 9 mm pistol, serial number YD7218,
- c. approximately seven rounds of 9 mm ammunition,
- d. approximately seven rounds of .45 ammunition.

FORFEITURE ALLEGATION – ANTONIO A. ACOSTA

Upon conviction of any offense in violation of 21 U.S.C. §§ 841 or 846, the defendant, **ANTONIO A. ACOSTA,** shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of each offense for which the defendant is convicted, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense(s) of conviction.

The property to be forfeited to the United States includes, but is not limited to, the following:

- a. a Taurus .40 caliber handgun, serial number SGW70052,
- b. approximately seven rounds of .40 ammunition, and
- c. approximately \$2,644 United States currency.

Upon conviction of any offense in violation of 18 U.S.C. § 922(g) or 924(c), the defendant, **ANTONIO A. ACOSTA,** shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in the commission of the offense, including, but not limited to:

- a. a Taurus .40 caliber handgun, serial number SGW70052, and

- b. approximately seven rounds of .40 ammunition.

FORFEITURE ALLEGATION – RUBEN MORONES

Upon conviction of any offense in violation of 21 U.S.C. §§ 841 or 846, the defendant, **RUBEN MORONES**, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of each offense for which the defendant is convicted, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense(s) of conviction.

The property to be forfeited to the United States includes, but is not limited to, the following:

- a. a Smith and Wesson M&P9 Shield 9mm handgun, serial number JBJ1265,
- b. approximately five rounds of 9 mm ammunition, and
- c. approximately \$17,016.02 United States currency.

Upon conviction of any offense in violation of 18 U.S.C. § 922(g) or 924(c), the defendant, **RUBEN MORONES**, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in the commission of the offense, including, but not limited to:

- a. a Smith and Wesson M&P9 Shield 9mm handgun, serial number JBJ1265, and
- b. approximately five rounds of 9 mm ammunition.

A TRUE BILL:

_____/s/_____
FOREPERSON OF THE GRAND JURY


Assistant United States Attorney